

Thank you for the opportunity to respond to the Notice of Proposed Rulemaking and Report on Broadcast Localism and (localism NPRM).

Cedar Ridge is very concerned with the ramifications the proposed rules will have on our broadcast facility. The conclusions are jolting to a non-commercial operation like ours. It is our contention that some of the proposals will have a major impact on the survivability of small broadcasters. The reduction in regulatory requirements and adoption of reliable technology has certainly increased the reliability of broadcasting rather than weakened it as the report implies.

In the matter of an advisory board, this decision to have an advisory board should be placed fully on the station licensee and not be part of any governmental regulation or oversight. WCRH is a non-commercial, listener-supported station, and our entire survival relies on meeting the needs of the community. Free market influences have a direct bearing on whether a station such as ours meets the needs and therefore the financial means for continued operation. Because we receive no government support or commercial income, if the needs of our listeners are not met, we cease to exist. The entire community is our advisory board and it is far better in telling us what is and is not working than a select group who are arbitrarily chosen.

The selection of any individual or group from the community to be on the advisory committee should be at the sole discretion of the station without any mandate. This is especially true in the case of religious stations who do not want to be forced to accept individuals who may not share the same deeply felt convictions, thoughts or beliefs. Allowing the station sole discretion in choosing members of the committee will also help offset some major concerns as to the amount of influence this board would hold over the broadcaster. It is in the best interest of the station to know what listeners want, and broadcasters who meet the needs of its listeners are the ones with the largest impact in the community.

We believe that reaching out to our community is our first obligation in broadcasting and in fact is the core to our mission statement. Because of the unique position of a noncommercial operation, we believe we can best determine how to meet the needs of our listeners without governmental directives and will know from our listeners when we are acting as responsible agents for meeting the public need. Like non-commercial broadcasters, rural stations would also be limited in the variety and expertise of the local community. There are also arguments that could be made that a small station lacks the staff to create a program of local issues to which the normal listener would find compelling.

We would contend that stipulating any requirements for local broadcasters who are in the community are unnecessary. Those who operate with no local presence and are rebroadcasting from hundreds, if not thousands of miles away may not meet the public need in a narrowly defined manner. However, we believe that the free market would still assist a broadcaster in knowing if they were

meeting local needs or not.

WCRH would also contend that restricting the use of voice tracks should not be a determination of government regulators. When properly utilized by station personnel, voice tracking continues to meet community needs. Depending on the oversight and desire of station personnel, this technology would not be limited in meeting the needs of the community. Stations in smaller markets would also certainly feel a financial burden if they could not use voice tracking since it is difficult to find and keep professional talent.

In relation to music playlists, previously stated arguments about a local NCE would apply. It is our feeling that the listener will respond and dictate through their support whether the music and programming is meeting listener needs. This would also be a major breach in the long held position of the FCC to not regulate programming.

The most potentially crippling rule under consideration, however, is regarding a twenty-four hour presence of staff. Modern broadcast technology has proven to be extremely reliable in regards to maintaining technical parameters at broadcast facilities. This equipment is in many ways more reliable than human interaction to perform the same function. I would urge the FCC not to take such draconian measures.

In addition to the reliability of such equipment, the increased financial burden of having a 24-hour staff presence is immense for a small, independent NCE station such as ours. Our staffing needs would increase significantly in both time needing coverage and financial outlay. As a broadcasting facility, the use of technology in monitoring and programming has made an enormous difference in our sustainability and ability to meet the needs of the community, which is our primary objective.

Standardizing the Issues/Programming list is agreeable and would assist in clarifying what should or should not be included. However, returning to ascertainment requirements would place additional burdens on small market stations that could impede day-to-day operations where there is a limited number of staff.

We would agree that the emergency alert system has issues and needs a review of its function and form. However, it is our contention that it is the system itself and not necessarily the broadcaster or their technology which needs the scrutiny. The systemic problems of the current EAS system begin at the point of origination and not at the final end of the chain where the broadcaster is held accountable. False, mislabeled, and delayed warnings that broadcasters receive do little to prepare listeners for a national or local emergency.

Cedar Ridge believes that a broadcast facility in a local community is the best judge on how their

presence meets the needs of that community. We do not feel that many of the government proposals addressed above represent a better knowledge of our community than those who live there. We respectfully request that the commission look strongly at the position we have stated above and adopt rulings accordingly.